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Alberta Employment, Immigration and Industry

**Surveillance Camera  
Calgary North - One Executive Place  
Calgary, Alberta**

Privacy Impact Assessment

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**FINAL REPORT**

November 2007

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Calgary North - One Executive Place  
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In consultation with:  
Information and Privacy Office

  
Employment, Immigration  
and Industry

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## **Chapter 1: Description of the Surveillance Camera Activity**

Alberta Employment, Immigration and Industry (“AEII”), Delivery Services provides services to clients at the Canada Alberta Service Centre located in the Calgary North - One Executive Place building in Calgary, Alberta. This leased building has a waiting room for clients on the fourth floor. Individuals using this space are waiting for appointments with Career Employment Counselors or the Support and Financial Services Coordinator. The waiting time is usually less than 10 minutes.

The surveillance camera is used to monitor individuals in the waiting room from another area of the building. The television monitor allows staff to identify if any conflicts arise when people are waiting for their appointments.

The surveillance camera is installed in the waiting room located at the fourth floor reception. The monitoring equipment is on the fourth floor accessible from an Administrative Support person’s workspace.

There is no video recording of images and no audio capacity in the camera, therefore no privacy implications were identified in regards to collection, and disclosure. This privacy impact assessment focuses on the use of the surveillance camera.

### **1.1 Responsible Public Body**

AEII is the Ministry responsible for the Alberta Service Centre located in the Calgary North - One Executive Place building.

### **1.2 Responsible Business Area**

The surveillance camera is the responsibility of the Area Business Manager for AEII, Calgary North – One Executive Place.

### **1.3 Contact Person**

The following individual can answer questions about the personal information collected, used and disclosed by the use of a surveillance camera.

[Area Business Manager](#)

Calgary North – One Executive Place  
Canada Alberta Service Centre  
Room 300 One Executive Place  
1816 Crowchild Trail NW  
Calgary, AB T2M 3Y7  
Tel. 403-297-7212

### **1.4 Overview**

The surveillance camera was installed to allow for monitoring of individuals waiting in the 4th floor waiting area of Calgary North - One Executive Place. Clients using this space are waiting to access services of an Employment Counselor or the Support and Financial Services Coordinator of AEII.

#### **1.4.1 Background**

In support of this service delivery the use of the surveillance camera allows departmental employees to have a presence in the unsupervised waiting area and be a deterrent to conflicts and inappropriate behaviors.

#### **1.4.2 Current Situation**

The surveillance camera was installed to monitor those in the waiting room located at the fourth floor reception area. This location is in the leased space within the Calgary North - One Executive Place Building. The 80 square foot area has chairs for seating and is only monitored by a camera. The waiting area is generally used by up to 5 clients at one time.

A sign is prominently displayed at the perimeter of the surveillance area so that clients have ample warning that surveillance is in operation before entering. The sign identifies who to contact to answer questions regarding the camera.

### **1.4.3 Surveillance Camera Project Overview**

The departmental security policy requires the completion of a Privacy Impact Assessment (PIA) along with the development of a process for managing the information collected by surveillance camera.

As part of the process, policies are developed for the operation and use of the system following the Government of Alberta's [Guide to Using Surveillance Cameras in Public Areas](#) (the "Guide"). These policies record the decisions made about access, use, disclosure, retention and destruction of the records from surveillance cameras. This is an internal document aimed at addressing all the details regarding the operations for the surveillance camera (refer to *Appendix 1*).

The Guide also recommends that both a PIA, and the business case prepared by the business unit, be submitted to the Office of the Information and Privacy Commissioner (OIPC) for acceptance.

The surveillance camera does not record any information and does not have audio capacity. The completion of a PIA and business case (refer to *Appendix 2*), demonstrates AEII's commitment to use best practices in addressing privacy issues around the use of a surveillance camera as identified by the OIPC.

## **1.5 Benefits of Surveillance Camera**

### **1.5.1 Benefits to clients of Alberta Employment, Immigration and Industry**

A surveillance camera is an effective technique aimed at protecting client safety and a deterrent to issues that may occur from having a waiting room that is in a self-contained area.

The waiting area does not have a staff member present to monitor activity. The use of the surveillance camera allows departmental employees to have a presence in the space and be a deterrent to conflicts and inappropriate behaviors.

### **1.5.2 Benefits to Alberta Employment, Immigration and Industry**

Surveillance cameras may protect public safety and may detect or deter criminal activity.

The waiting area is not visible to employees of the Department and the monitoring by the camera quickly allows staff to confirm that someone is waiting for an appointment with a client.

The intended use of the surveillance camera is aimed at deterring inappropriate behaviours in the waiting area and to reduce potential conflicts between clients.

## **1.6 Surveillance Camera Implementation**

The surveillance camera television monitor is located at the work space of an Administrative Support staff member. Other staff will only check the television monitor to identify that their client is in the waiting area.

There is no recording of information as the focus of the Program is to use the camera to monitor present activity.

## **Chapter 2: Personal Information Collected, Used and Disclosed by Surveillance Camera**

### **2.1 Personal Information Involved**

When the surveillance camera is operating, it captures images of the individuals in the room. The images of clients are visible on the television monitor and staff identify clients waiting to meet with them. The Administrative Support person checks the screen to ensure there is no issues while individuals are waiting.

The information captured by the camera constitutes information about an identifiable individual.

### **2.2 Personal Information Flow**

Images captured on the camera are relayed to a television monitor on the fourth floor. The activity in the room is monitored by an authorized employee of the business area.

No images are recorded onto any type of recording equipment and the camera does not have audio capacity.

### **2.3 Information Users**

The authorized employee visually monitors the room. A report of a public safety issue or incident in the room would be made to the workers in the area so that they can intervene. There is also a Commissionaire in the building who can also be called to respond to an observed incident.

Emergency procedures have been prepared including the appropriate response to an incident observed on the surveillance camera (refer to *Appendix 1*). These procedures were prepared by addressing the areas identified in the [Guide to Using Surveillance Cameras in Public Areas](#).

## Chapter 3: Protection of Personal Information Analysis

### 3.1 Collection of Personal Information

Section 33 of the *Freedom of Information and Protection of Privacy (FOIP) Act* requires that public bodies have authority to collect personal information. In this case, section 33(b) of the Act may apply if an incident occurs and personal information from the image is documented for the purposes of law enforcement.

**33** *No personal information may be collected by or for a public body unless  
(b) that information is collected for the purposes of law enforcement.*

The surveillance camera is used to monitor activity on the fourth floor of the Calgary North - One Executive Place building. The surveillance camera captures images of the clients and the public in the waiting area and transmits the image to a television monitor at the fourth floor workstation of an Administrative Support person.

No images are recorded on any type of recording device.

A sign is prominently displayed at the perimeter of the surveillance area so that clients have ample warning that surveillance is in operation before entering. The sign identifies who to contact to answer questions regarding the camera.

The authorized employee of the business unit monitoring the image will document the facts and circumstances of an incident for the purposes of law enforcement. Most clients waiting in this space are known to the Department and can be easily identified.

### 3.2 Manner of Collection of Personal Information

The images captured are viewed on a television monitor at the workspace of an Administrative Support staff member on the fourth floor of Calgary North - One Executive Place.

If the authorized employee of the business unit witnesses a threat to public safety, vandalism and/or theft, they will document a description of any individuals and activity they visually witnessed during the monitoring of activity. This process would be an indirect collection of information authorized under section 34(1)(g) *the information is collected for the purpose of law enforcement.*

### **3.3 Accuracy and Retention**

The images portrayed by the camera are not recorded or retained on any recording equipment.

Information documented by a worker or the Administrative Support person may be submitted to authorities and will be disclosed following procedures for investigating an incident.

### **3.4 Right to Request Correction of Personal Information**

As no record of the image of an individual is retained, a request for correction is not applicable.

### **3.5 Protection of Personal Information**

The television monitor is located at the workstation of the Administrative Support staff person and is accessed when required by workers providing services to the clients waiting in the waiting room.

No images are recorded on any type of recording device.

### **3.6 Use of Personal Information**

The viewing of images portrayed by the camera to the television monitor is to protect public safety and reduce the likelihood of conflict between clients.

### **3.7 Disclosure of Personal Information**

In the event of a threat to public safety or the detection of criminal activity the Administrative Support person would notify their supervisor, building security, and authorities (e.g. Police). Information may be documented for law enforcement purposes.

### **3.8 Disclosure for Research or Statistical Purposes**

The images portrayed by the camera are not recorded or retained on any recording equipment therefore there is no information to use for research or statistical purposes.

## Chapter 4: Potential Privacy Impacts

### 4.1 Mitigation of Potential Privacy Impacts

Publications are available to assist business areas when the use of surveillance cameras is being considered. The Government of Alberta's "[Guide to Using Surveillance Cameras in Public Areas](#)" is available on the Service Alberta website @ <http://foip.gov.ab.ca/resources/publications/SurveillanceGuide.cfm>.

The Alberta Employment, Immigration and Industry, Information and Privacy Office Advice Sheet on "Surveillance Cameras and Privacy Compliance" is available to departmental employees on the intranet site @ <http://ahreintranet.gov.ab.ca/departement/cs/foip/resources/faq/index.asp>

The information that is being captured by the surveillance camera at Calgary North - One Executive Place is not recorded. The images captured are checked in real time by workers of the area but the personal information is not recorded.

AEII staff in the building requested the use of a surveillance camera.

A Commissionaire at the site provides security for the building but is unable to actively monitor the waiting area. Given that the room is self contained and not visible to staff of the Department, the use of the surveillance camera allows staff to monitor for any conflicts. It is also believed that the camera acts as a deterrent for any potential incidents.

A sign is prominently displayed at the perimeter of the surveillance area so that clients have ample warning that surveillance is in operation before entering. The sign identifies who to contact to answer questions regarding the camera.

### 4.2 Conclusion

The surveillance camera was installed as a deterrent to potential issues in the waiting area located at Calgary North - One Executive Place. The goal is to reduce and eliminate conflicts and incidents for an area that is not visible to program staff.

The surveillance camera is thus being utilized for the monitoring of activity in the waiting area and no recording is made of the images captured.

Program staff have developed processes and procedures for the implementation of the surveillance camera to ensure that all staff are aware of the implications of having the surveillance camera and their responsibilities. An annual review will be conducted of the decision for the implementation of the surveillance camera to confirm that using this technology is still useful for the Program area.

## **Appendix 1: Policies and Procedures**

## **Appendix 2: Business Case**

## **Policy and Procedures for Surveillance Camera**

These policies and procedures address the recommendations found in the Guide to Using Surveillance Cameras in Public Areas and were developed by the Program Area.

### Use of the System's Equipment

The surveillance camera equipment has been set up to monitor individuals using the waiting room space on the fourth floor of the One Executive Place Building in Calgary. The images are viewed by staff on a monitor housed at the workspace of an Administrative Support staff member on the fourth floor of the building.

The camera is positioned at the top of the wall pointing towards the door where people enter, and covers the seating arrangement in the reception room.

The surveillance camera is actively monitored by the Administrative Support staff member. Other staff also check on what is occurring, particularly using the monitor to identify if their next client is waiting for their appointment. This monitor can be checked by all departmental staff (with ten Career Employment Counsellors) but the two Administrative Support staff have the closest access. Someone would look at this monitor at least every ten minutes.

The reception equipment is top of a filing cabinet and the recorded images are in black and white.

The system is used for monitoring purposes only.

Surveillance is in operation from 8:15 a.m. to 4:30 p.m.

### Designation of Responsible Person for Surveillance Camera

The senior staff member with responsibility for the surveillance camera operations is the Area Business Manager for Calgary North. The Area Business Manager will be responsible for ensuring that the Department's privacy obligations under FOIP are met along with any policies and guideline procedures.

### Orientation and Awareness Training Provisions

All Employment, Immigration and Industry employees are required to complete mandatory FOIP training once every three years. The Department offers customized Managing Information @ Work sessions. Specialized information on the use of a surveillance camera is also available from the FOIP office.

Employees using the surveillance camera will need to have overview training about how to use the surveillance camera including their responsibilities and obligations. All employees will need to review and comply with the policies around the surveillance camera and have this agreed to as part of their annual performance plan.

Employees need to be aware of the consequences for breaching the policy or the provisions of the FOIP Act or other relevant statute. Employees will need to sign that they have read this policy and agreed to its conditions.

### Review and Ongoing Orientation and Awareness Activities

The surveillance camera policy will be included in orientation for new employees and will also apply to any contractors working in the impacted area. On an ongoing basis there should be a review of the requirements for having the surveillance camera with the policies reviewed and modified regularly.

### Guidelines for Use

#### Installed in areas where Surveillance is Necessary

After a review of their security procedures, staff identified that the use of a surveillance camera would alleviate potential security concerns. A Business Case has been prepared that identifies support for a surveillance camera monitoring what is occurring in the waiting room area. The surveillance camera is a deterrent to theft and potential conflicts between clients.

Should an incident be viewed on the monitor a staff member would speak to the client if there was not violence involved. If a violent or dangerous incident was in process the Commissionaire is called. If the Commissionaire felt he could not handle the situation then the City Police are called.

#### Signage

A sign has been installed noting that there is a surveillance camera in use. The sign is posted around the perimeter so that members of the public have ample warning before entering the area under surveillance. The sign identifies who to contact to answer questions regarding the camera.

#### Location of Reception Equipment

The reception equipment for this camera is in a staff monitoring area. The television monitor is positioned so that only staff can view it, not members of the public.

#### Access, Use, Disclosure, Retention and Destruction of Surveillance Records

As no images are recorded onto any type of recording equipment, policies around retention and destruction are unnecessary.

In the event of an incident, staff will document individually what they observed on the monitor and keep this record as a description of the incident.

### Ongoing Procedural Review

There will be a regular review of these procedures and an opportunity to make changes and additions. This will be the responsibility of the Area Business Manager.